Postal Regulatory Commission Submitted 5/8/2015 1:36:39 PM Filing ID: 92236

Accepted 5/8/2015

BEFORE THE POSTAL REGULATORY COMMISSION WASHINGTON, D.C. 202268-0001

NORTH PLATTE MAIN POST OFFICE, NORTH PLATTE, NE 69101 DOCKET NO. A2015-3

MOTION FOR ENLARGEMENT OF TIME TO RESPOND TO MOTION TO DISMISS AND TO FILE FORM 61

COMES NOW Appellant and moves the Commission for an enlargement of time to

respond to the Motion to Dismiss filed by the United States Postal Service and to file Form 61,

and in support of said Motion, shows the Commission the following:

1. The United States Postal Service has failed to file its Administrative Record as

required by the ORDER ACCEPTING APPEAL AND ESTABLISHING PROCEDURAL

SCHEDULE issued by the Postal Regulatory Commission on April 21, 2015.

2. Appellant seeks the filing of the Administrative Record by the United States

Postal Service in an attempt to respond to the Motion to Dismiss filed by the United States Postal

Service and to file Form 61.

3. Transparency and accountability dictate that this Appellant and the Postal

Regulatory Commission have an opportunity to review the Administrative Record in this case

prior to Appellant or the Commission having to take action.

4. Appellant submits that, given an opportunity to review and reference the

Administrative Record, Appellant will be in a position to prevail in its efforts to require the

United States Postal Service to comply with all regulations prior to taking action which will

adversely impact United States Postal Service operations in North Platte, Nebraska.

Appellant moves the Commission for an order allowing Appellant ten (10) days from the filing of the Administrative Record within which to respond to the Motion to Dismiss filed by the United States Postal Service and to file Form 61

Respectfully Submitted,

DOUGLAS L. STACK, NE #16377 Attorney for Dwight Livingston, Mayor City of North Platte